

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

PATRICIA LOWRY, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

RTI SURGICAL HOLDINGS, INC.,
CAMILLE I. FARHAT, BRIAN K.
HUTCHISON, JONATHON M. SINGER,
ROBERT P. JORDHEIM, and JOHANNES
W. LOUW,

Defendants.

No.: 20-cv-01939

Honorable Matthew F. Kennelly

**DEFENDANTS RTI SURGICAL HOLDINGS, INC., CAMILLE I. FARHAT, AND
JONATHON M. SINGER'S MOTION TO DISMISS THE AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 12(b)(6), the heightened pleading standards of the Private Securities Litigation Reform Act and Fed. R. Civ. P. 9(b), Defendants RTI Surgical Holdings, Inc., Camille I. Farhat, and Jonathon M. Singer move to dismiss the Consolidated Amended Class Action Complaint for Violations of the Federal Securities Laws of Lead Plaintiff Rosy Yeretsian.

The Amended Complaint lacks sufficient factual allegations to state a claim for violation of Section 10(b) and Rule 10b-5, or Section 20(a) of Securities and Exchange Act of 1934, and should be dismissed for failure to state a claim on which relief can be granted.

Defendants have filed a memorandum in support of this motion.

Wherefore, for the reasons cited in their Memorandum in Support of this Motion to Dismiss, Defendants RTI and Messrs. Farhat and Singer respectfully request that the Court enter an order dismissing the Consolidated Amended Class Action Complaint in its entirety.

Dated: October 15, 2020

Respectfully Submitted,

By: /s/ Martin G. Durkin

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Jonathon M. Singer*